

THE HONORABLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CLEAN-SHOT ARCHERY, INC., a  
Washington Corporation,,

Plaintiff,

v.

HUNTER'S MANUFACTURING  
COMPANY, INC., (dba TEN POINT  
CROSSBOW TECHNOLOGIES), a Nevada  
Corporation,

Defendant.

NO.

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Plaintiff Clean-Shot Archery, Inc. ("Clean-Shot" or "Plaintiff"), for its complaint  
against Hunter's Manufacturing Company, Inc. ("Hunter's" or "Defendant"), alleges as  
follows:

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RULE 7.1 DISCLOSURE STATEMENT OF  
COMPLAINT FOR PATENT INFRINGEMENT - 1 -

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**NATURE OF THE ACTION**

1  
2 1. This is an action for infringement of U.S. Patent No. 8,777,786 (the “ ‘786 Patent”)  
3 a true and correct copy of which is attached hereto as Exhibit A. Plaintiff undertakes this  
4 action pursuant to the patent laws of the United States, 35 U.S.C. §§ 271 and 281, and seeks  
5 damages and injunctive relief resulting from Defendant’s unauthorized manufacture, use, sale,  
6 offers to sell, and/or importation into the United States of products, methods, processes,  
7 services, and/or systems that infringe one or more claims of the ‘786 Patent.  
8

**PARTIES**

9  
10 2. Plaintiff Clean-Shot is a corporation organized and existing under the laws of the  
11 State of Washington with its principal place of business located in Kent, Washington.

12 3. Defendant Hunter’s is a corporation organized and existing under the laws of the  
13 State of Nevada, with its principal place of business located at 1325 Waterloo Rd., Suffield,  
14 Ohio 44260. Hunter’s makes, uses, sells, offers for sale, and/or imports into the United States  
15 certain products that infringe one or more claims of the ‘786 Patent.  
16

**JURISDICTION AND VENUE**

17  
18 4. This action arises under the patent laws of the United States, Title 35 of the United  
19 States Code, §§ 271 and 281, et seq. This Court has original subject matter jurisdiction over  
20 this patent infringement action under 28 U.S.C. §§ 1331 and 1338(a).  
21

22 5. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b). Defendant has  
23 transacted business in this district, has committed acts of patent infringement in this district,  
24 and has placed its infringing products and services into the stream of commerce throughout  
25  
26

1 the United States with the expectation that they will be used by consumers in this judicial  
2 district.

3 6. Defendant is subject to personal jurisdiction in Washington and this judicial district,  
4 and is doing business in this judicial district.

5 **COUNT I**

6 **INFRINGEMENT OF THE '786 PATENT**

7  
8 7. Plaintiff repeats and realleges the allegations of paragraphs 1 through 6 as if fully  
9 set forth herein.

10 8. On July 15, 2014, the U.S. Patent and Trademark Office duly and lawfully issued  
11 the '786 Patent.

12 9. Plaintiff is the sole assignee of the '786 Patent and the invention described and  
13 claimed therein, with all substantial rights with respect thereto. Plaintiff has the legal right to  
14 enforce the '786 Patent, including the right to pursue an action for infringement of the '786  
15 Patent and the right to seek damages, equitable relief, and any other remedies for, or with  
16 respect to, any infringement of the '786 Patent.

17  
18 10. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant  
19 has infringed the '786 Patent by making, using, selling, offering for sale, and/or importing  
20 methods and/or products forming an association in the manner claimed by the '786 Patent,  
21 including, but not limited to, the OMNI-BRITE UNIVERSAL LIGHTED NOCK SYSTEM,  
22 to the damage and injury of Plaintiff.

23  
24 11. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to recover damages from  
25 Defendant to compensate Plaintiff for Defendant's infringement.



**JURY DEMAND**

Plaintiff demands a trial by jury of all matters to which it is entitled to trial by jury.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests that this Court enter judgment against Defendant as follows:

A. An adjudication that the Defendant has infringed the '786 patent;

B. As provided under 35 U.S.C. § 284, an award of damages to be paid by Defendant to Plaintiff adequate to compensate Plaintiff for Defendant's infringement of the '786 Patent, including pre- and post-judgment interest, costs, expenses and an order for an accounting of all infringing acts;

C. A judgment enjoining and restraining Defendant and its subsidiaries, parents, officers, directors, agents, servants, employees, agents, affiliates, attorneys, and all other persons in active concert or participation with Defendant from directly infringing, inducing infringement, and/or contributing to the infringement of the '786 Patent.

Dated this 15th day of July, 2014.

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